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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

Patricia Navarro,
Plaintiff,
vs.
Kilolo Kijakazi, Acting
Commissioner of Social Security,
Defendant.

} Case No. 1:22-cv-01563-SKO

} ORDER GRANTING
STIPULATION AND UNOPPOSED
MOTION FOR EXTENSION OF
TIME
(Doc. 15)

}

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from April 24, 2023 to June 23, 2023, for Plaintiff to serve on defendant with Plaintiff's Motion for Summary Judgment. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's second request for an extension of time. Good cause exists for the requested extension. For the weeks of April 17 2023 and April 24, 2023, Counsel currently has 12 merit briefs, and several letter briefs and reply

1 briefs. This includes cases that undersigned counsel took on during co-counsel's,
2 Dolly M. Trompeter, leave of absence. Additional time is needed to thoroughly
3 brief this matter for the Court.

4 Counsel for Plaintiff is currently taking partial leave as his child was born on
5 October 14, 2022. Thus, Counsel is working limited hours.

6 Additionally, Counsel underwent major surgery on March 15, 2023,
7 requiring post-op physical therapy, with the need for several breaks throughout the
8 workday.

9 Defendant does not oppose the requested extension. Counsel apologizes to
10 the Defendant and Court for any inconvenience this may cause.

11
12 Respectfully submitted,

13 Dated: April 3, 2023 PENA & BROMBERG, ATTORNEYS AT LAW
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15 By: /s/ Jonathan Omar Pena
16 JONATHAN OMAR PENA
17 Attorneys for Plaintiff

18
19 Dated: April 3, 2023 PHILLIP A. TALBERT
20 United States Attorney
21 MATHEW W. PILE
22 Associate General Counsel
23 Office of Program Litigation
Social Security Administration

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25 By: */s/Oscar Gonzalez de Llano
26 Oscar Gonzalez de Llano
27 Special Assistant United States Attorney
28 Attorneys for Defendant
(*As authorized by email on April 3, 2023)

ORDER

Pursuant to the parties' stipulation and unopposed motion for an extension of time (Doc. 15), IT IS HEREBY ORDERED that Plaintiff shall have an extension, up to and including June 23, 2023, to file Plaintiff's Motion for Summary Judgment. The deadlines in the Scheduling Order (Doc. 5) are hereby extended accordingly.

IT IS SO ORDERED.

Dated: April 4, 2023

/s/ Sheila K. Oberto

UNITED STATES MAGISTRATE JUDGE